

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA, VIRGINIA

<u>In re:</u>	:	
	:	
Victor M. Negron, Jr.	:	CASE NO. 17-10063-KHK
	:	CHAPTER 13
Debtor(s)	:	
	:	

DEBTOR'S OPPOSITION TO TRUSTEE'S OBJECTION TO CONFIRMATION OF
AMENDED PLAN

COMES NOW, Victor M. Negron, Jr., by counsel, and opposes the Chapter 13 Trustee's Objection to Confirmation of Amended Plan, and in support thereof states as follows:

1. This Court's Order of October 13, 2017 directed Debtor to file an Amended Plan that accounted for the post-petition mortgage arrearage of \$8,559.02 owed to Wells Fargo (Debtor calculated the arrearage as \$8,564.62). Debtor filed his Amended Plan after the Order had been circulated, but prior to entry by this Court.
2. The Amended Plan is feasible as the additional funds due Wells Fargo are paid through the Plan without increasing the monthly Plan payments or increasing the Plan term. Debtor is currently \$13,501.04 ahead on his existing Plan payments (interim accounting of 11/17/2017 attached).
3. Pursuant to this Court's Order of October 13, 2017, Wells Fargo's amended proof of claim is not due until December 12, 2017.
4. Wells Fargo does not object to the Amended Plan.

WHEREFORE these premises considered, Debtor requests that this Court overrule the Trustee's objection and confirm the amended plan.

Respectfully submitted,

Victor M. Negron, Jr.
By counsel

____/s/ Eric David Kessel_____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of November, 2017, I served via ECF to authorized users or mailed a true copy of the foregoing Debtor's Opposition to Trustee's Objection to Confirmation of Amended Plan to the following:

Thomas P. Gorman, Esq.
Chapter 13 Trustee
300 N. Washington St., Suite 400
Alexandria, VA 22314

Lauren French, Esq.
BWW Law Group, LLC
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Richmond, VA 23229
Counsel for Wells Fargo

____/s/ Eric David Kessel_____
Eric David Kessel